

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS CARPENTERS CENTRAL)	
COLLECTION AGENCY, et al)	
Plaintiffs,)	
)	CIVIL ACTION
v.)	NO. 04-11123-NG
)	
E A G CONSTRUCTION & INSTALLATION,)	
Defendant.)	
_____)	

AFFIDAVIT OF DAMAGES AND TAXABLE COSTS

Harry Dow, under penalties of perjury, hereby declares as follows:

1. I am presently the Director of plaintiff Massachusetts Carpenters Central Collection Agency.
2. In that capacity I am responsible for receiving the contributions due to certain employee benefit funds (referred to collectively as “the Funds”) from employers such as defendants that have entered into collective bargaining agreements with local unions of the United Brotherhood of Carpenters & Joiners of America pursuant to which they have agreed to make certain payments to the plaintiff.
3. Defendant E A G Construction & Installation is delinquent in its contributions and payments due plaintiff in the amount of \$117,541.51 through August 2004.
4. The liquidated damages and interest charges on the amount owed to the Funds by E A G Construction & Installation that are required by the Trust Agreements

pursuant to which they were established and the relevant collective bargaining agreement, computed to August 31, 2004 are \$24,778.60 and \$6,351.52 respectively.

5. The reasonable attorney's fees for instituting and prosecuting this action that is required by the Trust Agreement and the relevant collective bargaining agreement are \$700.00.

6. The costs incurred by the plaintiff in bringing this action consisting of filing and service fees total \$195.52.

7. The total amount owed to the Massachusetts Carpenters Central Collection Agency by defendants consisting of the separate amounts listed in paragraphs 3 through 6 of this affidavit, totals \$149,567.15.

8. That the defendant is neither an infant and/or an incompetent person, nor in the military services of the United States.

I declare under the penalties of perjury that the foregoing is true and correct this 25th day of October, 2004.

/s/Harry Dow_____

Harry Dow, Director

Massachusetts Carpenters Central Collection
Agency

CERTIFICATE OF SERVICE

I, Christopher N. Souris, hereby certify that I caused a copy of the foregoing to be mailed this date to E A G Construction & Installation, P.O. Box 807, Boston, MA 02103

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/s/ Christopher N. Souris_____

Christopher N. Souris